

1 about. I was the assistant section chief when
2 Paul was transferred. About that time we had, as
3 I recall it, only really a handful of attorneys,
4 and I don't remember the exact number because the
5 numbers in the juvenile section have gone down as
6 low as five or six, I can recall at some point,
7 and as high as 12 when I was over it or
8 thereabouts, but I remember we were sort of at
9 the low point when Paul was transferred over and
10 I was the assistant section chief.

11 I was told that although Paul was
12 transferred, I was not the acting section chief.
13 So I was the assistant chief with no section
14 chief and with only a handful, relative handful
15 of attorneys.

16 At one point some attorney showed up
17 in my office saying -- I don't exactly remember
18 who it was, although there were two or three of
19 them, and they said that they wanted to request
20 that Paul be brought back in because of the
21 effect that the staffing conditions were having
22 on the juvenile section, and they didn't want me

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1 to feel hurt. In other words, it wasn't a
2 reflection on my ability to run the section;
3 merely it was a fact of life that whatever else
4 was going on, the section was hurting by the
5 number of attorneys and having only half the
6 supervisors.

7 Quite frankly, now we have a section
8 chief and two assistant section chiefs, so at
9 that point we only had one assistant section
10 chief. So they wanted to make sure, you know,
11 that I understood, that they didn't want to hurt
12 my feelings basically, and so what they did was
13 they had two letters made out, and I don't
14 remember if it was to Rigsby or whoever the
15 Corporation Counsel or acting or interim
16 Corporation Counsel was, because also we have
17 gone through lots of heads of this agency and so
18 it's tough sometime for me to remember who was in
19 charge overall at any given point.

20 So they had this letter that was
21 drafted to either the head of the agency, whoever
22 that was, or to Robert Rigsby, and they had two

1 versions of it, and basically one was signed by
2 people in the section and one was signed by
3 people in the section with a signature block for
4 me, and they said that they were going to hand in
5 one or the other one. Their feelings would not
6 be hurt if I didn't sign it, that I might be
7 vying for the section chief position when Paul
8 was out and it might be awkward for me to sign
9 on, in which case they would submit the other
10 one, or I could sign onto the one that was
11 previously drafted, and I said, "No, I'm willing
12 to sign on."

13 Quite frankly, I was overwhelmed in
14 the position at that point with the amount of
15 work that I had to do in a day or in a week, and
16 I signed on the letter requesting that Paul be
17 transferred back.

18 Q. Do you recall who these attorneys
19 were?

20 A. No, I don't. I just remember there
21 were two or three, and it was at least one guy
22 and one girl. It might have been two girls. If